

*United States Attorney
Southern District of New York*

September 4, 2024

BY ECF

The Honorable George B. Daniels
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Michelle Bond*, 24 Cr. 494 (GBD)

Dear Judge Daniels:

On August 22, 2024, defendant Michelle Bond had her initial appearance on the Indictment in the above-referenced case before the Honorable Ona T. Wang, United States Magistrate Judge. At the initial appearance, Judge Wang excluded time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), through September 5, 2024. By order dated September 3, 2024, the arraignment in this matter was scheduled for September 17, 2024.

Accordingly, the Government respectfully requests, with the consent of defense counsel, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), through September 17, 2024. The Government respectfully submits that an exclusion of time would serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial because it would allow the parties to begin to produce and review discovery, to consider potential motion practice, and to engage in discussions regarding a potential resolution of the matter without the need for trial.

The Government respectfully encloses a proposed order excluding time for the Court's consideration.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/
Sheb Swett / Stephanie Simon
Assistant United States Attorneys

cc: All counsel of record (by ECF)